

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION

KASEY D. ALVES PLAINTIFF

VERSUS CIVIL ACTION NO. 1:06cv912LG-JMR

HARRISON COUNTY MISSISSIPPI, BY DEFENDANTS
AND THROUGH THE BOARD OF SUPERVISORS;
HARRISON COUNTY SHERIFF'S DEPARTMENT;
SHERIFF GEORGE PAYNE, JR.; AND
HEALTH ASSURANCE, LLC

DEPOSITION OF DOROTHY BLANKENSHIP
taken before Huey L. Bang, Certified Shorthand
Reporter and Notary Public in and for the State
of Mississippi at 2217 Pass Road, Gulfport,
Mississippi on the 15th day of January, 2008.

APPEARANCES:

Representing the Plaintiff:

WOODROW W. PRINGLE, III, ESQUIRE
2217 Pass Road
Gulfport, Mississippi 39501

Representing Harrison County Sheriff's
Department:

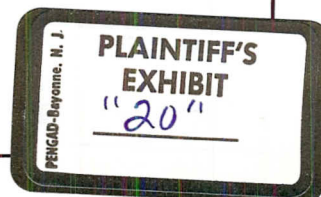
TRACE D. MCRANEY, ESQUIRE
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2909 13th Street
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Representing Health Assurance, LLC:

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Jackson, Mississippi 39201

Reported By:

Huey L. Bang, CSR #1147, RMR, CRR,
Notary Public



1 A. Well, I was truthful with them. I
2 told them that there was things going on that I
3 didn't go along with, that I didn't think were
4 right.

5 Q. Okay. Can you tell me what those
6 things were?

7 A. Well, just incidents that were
8 happening, like abuse, and basically that was
9 it.

10 Q. And when you say abuse, I'm not trying
11 to put words in your mouth, I'm trying to have
12 you explain to me what do you mean by abuse,
13 who was abusing who?

14 A. Sometimes the officers were abusing
15 the residents.

16 Q. When you would observe these types of
17 things, would you make a note of these?

18 A. Yes, sir.

19 Q. And where would you make a note of it?

20 A. Well, usually, of course, made a
21 mental note, but I wrote it down and always
22 complained to someone, gave it written papers.

23 Q. Who would you give it to?

24 A. To Captain Gaston in booking.

25 Q. Okay. And did you do that on each

1 occasion that you observed some type of abuse
2 going on?

3 A. Not on all occasions, but I started to
4 -- first, let's go back. I always would tell
5 S1 or someone in charge. I would go to them
6 and say hey, you know, I saw this, it's not
7 right, something needs to be done.

8 Q. And when you say S1, what do you mean
9 by that?

10 A. Well, it might have not been S1. It
11 could have been whoever the lead person in
12 charge. It could have been a lieutenant or
13 whoever was at that specific time was in
14 charge.

15 Q. Is S1 a designation of a person in
16 charge?

17 A. Yes, sir, usually the top ranking
18 officer would be S1.

19 Q. Ranking officer on duty that
20 particular day?

21 A. Yes, sir.

22 Q. So you would go to that individual and
23 voice a verbal complaint?

24 A. Yes, sir.

25 Q. And after you voiced a verbal

1 out some information from you.

2 A. The time frame was probably during the
3 whole time.

4 Q. Okay. And again, I'm just trying to
5 find out information. I'm not looking go hurt
6 you, not looking to sue you, not looking to do
7 anything to hurt you. I know this isn't
8 comfortable for you, so all I'm trying to do is
9 find out what you know. I'm trying to do this
10 as quickly as I can, honestly. And I will get
11 you out of here as quick as I can. I'm not
12 going to ask you about your son, if that's what
13 you are worried about. I'm not going to ask
14 you about him.

15 So you would say that during the
16 entire time you've worked there, that you had
17 observed abuse and made complaints; is that
18 correct?

19 A. Yes, sir.

20 Q. And again, no one ever followed up
21 with your complaints or interviewed you after
22 you made your complaints?

23 A. No one ever called me and said, hey,
24 explain what went on down there, no one ever
25 did that. I mean, we would talk about it in

1 medical because we were all on the same page,
2 but no one -- because we don't work for the
3 Harrison County. But no one from Harrison
4 County ever called me.

5 Q. When you would say you would talk
6 about it in medical, talking about to other
7 people that worked there?

8 A. Yes, sir.

9 Q. Did you report the things that you
10 observed to anyone else other than the
11 sheriff's department officials?

12 A. Just, I mean, working with people, you
13 know, we talked about stuff like that.

14 Q. Okay. Would you make notations in
15 your records of what you observed?

16 A. In medical charts I would.

17 Q. Okay. So in that particular
18 resident's chart there would be some notation
19 of what you observed; is that correct?

20 A. Correct.

21 Q. And these charts were kept at the --
22 were they kept at the jail?

23 A. They were kept in the medical
24 department.

25 Q. And would you -- I know you said you

1 occasion that you observed some type of abuse?

2 A. The best of my recollection I did.

3 Q. At least if nothing else, you made a
4 verbal report to the officer in charge?

5 A. Oh, yes, sir.

6 Q. So on each occasion you made some type
7 of report either verbal or in writing; is that
8 correct?

9 MR. McRANEY:

10 Objection, asked and answered.

11 EXAMINATION BY MR. PRINGLE:

12 Q. Is that correct?

13 A. To the best of my knowledge, yes.

14 Q. You mentioned Captain Gaston. Do you
15 remember any of the other officers or officers
16 in charge that you ever made reports to
17 concerning abuse at the jail?

18 A. I've told numerous on -- like Captain
19 Rogers, Sergeant Leonard, Sergeant Thompson,
20 anyone in authority, in charge.

21 Q. And Captain Rogers, Sergeant Thompson,
22 do you remember any other names of people you
23 reported abuse to?

24 MR. McRANEY:

25 I don't mean to interrupt. You